

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

CHRISTINE BIROS,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Civil Action No. 2:23-cv-000297-RJC
	)	
SHANNI SNYDER et al.,	)	
	)	
Defendants.	)	

**MOTION OF PLAINTIFF CHRISTINE BIROS FOR LEAVE TO FILE  
CONSOLIDATED RESPONSE TO MOTIONS TO DISMISS AND TO EXTEND  
PERIOD FOR FILING OF RESPONSE**

Plaintiff, Christine Biros, respectfully requests that this Court permit her to file a consolidated response to the several motions to dismiss her Complaint in this action and further requests that this Court allow her until June 6, 2023 to file that response. In support of that request, she states as follows:

1. This Court's granting this motion will conserve the resources of the Court.

**Background**

2. Biros filed her Complaint in this action on February 24, 2023. *See* Doc. No. 1. As directed by this Court, she timely filed her RICO Case Statement on March 13, 2023. *See* Doc. No. 15.

3. Following this Court's granting of extensions, each of the Defendants filed a motion to dismiss that Complaint.

4. Defendant J. Allen Roth filed a motion to dismiss, for judgment on the pleadings, or to strike and a brief in support of that motion on April 23, 2023. *See Doc. Nos. 32, 33.*

5. Defendant Kash Snyder filed a consolidated motion to dismiss or for a more definite statement and brief in support on April 27, 2023. *See Doc. No. 34.* In that motion, he expressly incorporated the arguments that Roth had made in his motion. *See id.* at 1. He made additional arguments. *See generally id.*

6. Defendant George Snyder filed a motion to dismiss on that same date. *See Doc. No. 35.* In it, he expressly incorporated Roth's and Kash Snyder's motions to dismiss. *See id.* at 4. He made additional arguments. *See generally id.*

7. Defendant Shanni Snyder filed a consolidated motion to dismiss and memorandum in support on May 1, 2023. *See Doc. No. 36.* She, too, expressly incorporated the previously-filed motions to dismiss. *See id.* at 1. She made additional arguments. *See generally id.*

8. By email to the addresses that the Defendants have each provided for this Court's ECF system, Biros requested on May 10, 2023 that the Defendants consent to the relief she seeks in this motion.

9. Both Shanni Snyder and Kash Snyder have consented to this relief. As of this writing, neither George Snyder nor Roth has responded to this request.

**This Court Should Grant This Motion.**

10. Biros's filing of a consolidated response will conserve the resources of this Court and all parties.

11. If Biros files a single response, neither this Court nor the Defendants will need to navigate repetitive statements of the facts that Biros has alleged. Particularly as the Defendants have incorporated many of each other's arguments, a consolidated response will also spare this Court and the Defendants from review of repetitive refutations of arguments made by multiple parties.

12. Biros will not need to prepare those repetitive filings.

13. Pursuant to this Court's standing Order and Procedures Re: Civil Motions Practice, responses to the Defendants' motions would ordinarily be due twenty-one days after those motions were filed.

14. This Court's setting a deadline of June 6 for Biros's consolidated response will also further the interests of justice. Biros's counsel has reviewed the work involved and has determined that it can comply with that deadline. *See Fed. R. Civ. P. 6(b).*

15. As noted above, Biros has requested the Defendants' consent to this relief.

16. Two of the Defendants have consented to this relief, and none of the Defendants has indicated any opposition to it.

17. Biros does not make this motion for purpose of delay.

WHEREFORE Biros respectfully requests that this Court grant this motion and enter the relief that she requests.

Respectfully submitted,  
BERNSTEIN-BURKLEY, P.C.

Dated: May 12, 2023

By: /s/ Stuart C. Gaul, Jr.  
Kirk B. Burkley, Esq.  
(PA. I.D. #89511)  
Stuart C. Gaul, Jr., Esq.  
(PA. I.D. #74529)  
Daniel McArdle Booker Esq.  
(PA. I.D. #320890)  
601 Grant Street, 9<sup>th</sup> Floor  
Pittsburgh, PA 15219  
Telephone: (412) 456-8100  
Facsimile: (412) 456-8135  
[kburkley@bernsteinlaw.com](mailto:kburkley@bernsteinlaw.com)  
[sgaul@bernsteinlaw.com](mailto:sgaul@bernsteinlaw.com)  
[mbooker@bernsteinlaw.com](mailto:mbooker@bernsteinlaw.com)

*Attorneys for Plaintiff, Christine Biros*

**CERTIFICATE OF SERVICE**

I certify that, on this 12th day of May, 2023, I served the foregoing Motion of Plaintiff Christine Biros for Leave to File Consolidated Response to Motions to Dismiss and to Extend Period for Filing of Response on all Defendants by means of this Court's ECF System.

*/s/ Stuart C. Gaul, Jr.*